

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: February 7, 2001/ 0830-0930

Site Contact(s): Kent Dorr, K-H
Steve Tower, RFFO

Phone: 966-6034

Regulatory Contact: Dave Kruchek

Phone: 966-6728

Agency: CDPHE

Purpose of Contact: Weekly 800 Area Meeting

Discussion

This contact record has been revised to address comments and concerns of Dave Krechek. Any changes to the original contact record are shown in bolded font.

During the weekly 800-area meeting held between RFFO (Steve Tower), K-H (Kent Dorr), CDPHE (Dave Kruchek) and others, the following was discussed.

1. **Most** fixed equipment can be removed as long as the Consultative process is used. LRA approval is required after reviewing the IWCP package, and agreement is reached that the work can progress. Therefore, Item 2 that follows, addresses five pieces of equipment that are being removed from Building 865, in accordance with Section 1.1.5 of the DPP.
2. A new section 9 (of an IWCP) was delivered to Dave Kruchek for the removal of fixed equipment in B865. The pieces of equipment (steam hammer oil pump, mini hip controller, and wall crane) are not connected to building ventilation systems or any system with a pathway to the environment. **The hot water heater is attached to the plumbing system and the caustic pump has the potential for a release.** These pieces of equipment are attached to the floor and/or walls, and there are electrical as well as plant air attached to several of the units. Dave Kruchek's comment is as follows: "All pipes need to be properly plugged to prevent any possible release of contamination or fluids after removal of this equipment. This includes airlines as well as water, caustic, and drain lines. This is necessary to provide for safe transportation of the equipment during removal as well as providing a stable building environment

once the equipment is removed.” Kent Dorr responded that this will be completed as requested and that documentation and a walk down would be provided to Mr. Kruchek after the work is completed.

3. Dave Kruchek will inform KH on the yes or no approval decision for the removal of the remaining ceiling tiles in the hallway of B865. Dave doesn't believe that the ceiling tile removal is much of an issue here, but is a concern in the other buildings.
4. The meeting notes and agreements made during building walk downs will be more specific. Room identification as well as pictures to accompany work requests.
5. **In accordance with Section 3.3.4 of the DPP, prior to “mothballing” each facility (such as B865), a hazard analysis will be generated to identify the anticipated hazards as well as the path forward in dispositioning of these situations. This document is to be presented to DOE and CDPHE when completed. Dave Kruchek stated that the document is not specifically submitted for CDPHE approval, but that their concerns must be properly addressed prior to mothballing a facility.**
6. **The project's position is that RLCRs are to be used for facility typing, and not specifically for worker safety. RLCRs can and are used in support when developing IWCP packages, but are not relied on for worker safety because they are not as specific as JHAs. The IWCPs, JHAs and work permits are the documents to be used in identifying and controlling work hazards covering worker safety. However, Dave Kruchek believes that “RLCRs provide the physical, chemical, and radiological hazards to be encountered while decommissioning a building. As such, they are intended to be used for worker safety.”**

This contact record is being forwarded to the CERCLA Administrative Record.

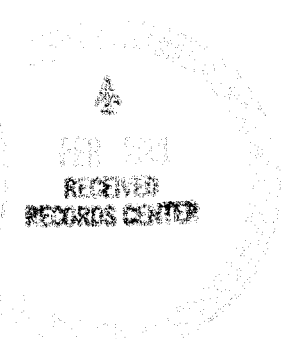
Contact Record Prepared By: Kent Dorr

Required Distribution:

J. Legare, RFFO
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S. Gunderson, CDPHE
D. Kruchek, CDPHE
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